

GOMEZ LLC

ATTORNEY AT LAW

December 4, 2009

VIA CM/ECF AND REGULAR MAIL

The Honorable Esther Salas, U.S.M.J.
U.S. District Court, District of New Jersey
Martin Luther King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Michele Sander v. HR Trust Services, LLC, et al.
Civ. No. 08-1383 (PGS/ES)
U.S. District Court, District of New Jersey

Dear Judge Salas:

My firm serves as New Jersey counsel for defendants Superien ("Superien") Health Networks and Interplan ("Interplan") Health Group in the above-referenced matter.

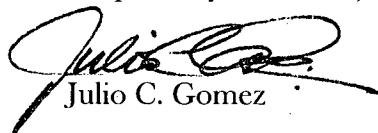
With the consent of counsel for the other parties, the following informal application is submitted for Your Honor's consideration seeking admission *pro hac vice* of Charles R. Bacharach, Esq. of the law firm Gordon Feinblatt Rothman Hoffberger & Hollander, LLC. Mr. Bacharach shall be substituting for R. Michael Smith who has left the firm.

Enclosed please find the following documents in support of this informal application:

1. Certification of Charles R. Bacharach, Esq.;
2. Certification of Julio C. Gomez, Esq. - undersigned counsel; and a
3. Proposed Order on informal application.

Thank you in advance for your anticipated assistance.

Respectfully submitted,



Julio C. Gomez

Enclosures

cc: All Counsel of Record (via CM/ECF w/ encl.)

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Attorney for Defendants, Superien Health Networks
and Interplan Health Group

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHELE SANDER,

Plaintiff,

v.

HR TRUST SERVICES, LLC, *et al.*,

Defendants.

Civil No. 08-cv-1383 (PGS-ES)

**CERTIFICATION OF CHARLES R. BACHARACH, ESQUIRE
IN SUPPORT OF HIS REQUEST TO APPEAR *PRO HAC VICE***

I, **Charles R. Bacharach, Esquire**, of full age, solemnly swear and hereby declare and certify as follows:

1. I am a partner with the firm of Gordon Feinblatt Rothman Hoffberger & Hollander, LLC, located at 233 E. Redwood Street, Baltimore, Maryland, 21202; my telephone number is (410) 576-4169; my fax number is (410) 576-4292; and my e-mail address is cbacharach@gfrlaw.com. I make this certification in order to place certain information before the Court in support of my request to appear *pro hac vice* in the above-captioned matter pursuant to Loc. Civ. R. 101.1(c).

2. Defendants Superien Health Networks ("Superien") and Interplan Health Group ("Interplan") retained me and my law firm to defend this instant action brought by plaintiff Michele Sander.

3. My firm and I are associated in this matter with Julio C. Gomez, Esq. of GOMEZ LLC Attorney At Law, 111 Quimby Street, Suite 8, Westfield, New Jersey 07090, counsel of record for defendants Superien Health Networks ("Superien") and Interplan Health Group ("Interplan"). Mr. Gomez has advised me that he is admitted to practice before this Court and is in good standing.

4. I am a member in good standing of the following Bars, and there are no pending disciplinary proceedings against me in any State or Federal court. Additionally, no disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

<u>Court</u>	<u>Date of Admission</u>
Court of Appeals of Maryland	1988
Court of Appeals of the District of Columbia	1996
U.S. District Courts for the District of Maryland	1990
District of Columbia	1997
U.S. Circuit Courts of Appeals Fourth	1990
Second	1995
District of Columbia	1994

5. I request to be permitted to appear *pro hac vice* in this action pursuant to Local Civil Rule 101.1(c); however, all pleadings, briefs and other papers filed with the Court on behalf of defendant shall be signed and filed by Julio C. Gomez, Esq. (JG-0005), a member of the bar of this Court, who also shall be responsible for said papers, and for the conduct of the

cause, and who shall be present in Court during all phases of these proceedings, unless expressly excused by the Court, and who will be held responsible for my conduct.

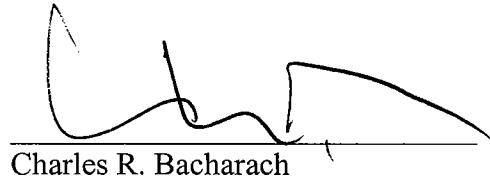
6. I shall remit to the New Jersey Lawyers' Fund for Client Protection the annual payment required by New Jersey Court Rule 1:28-2(a) for each calendar year in which I continue to represent a client in a matter pending in this Court pursuant to Local Civil Rule 101.1(c)(2).

7. I shall make payment of \$150.00 payable to the Clerk, United States District Court for the District of New Jersey, upon approval of this Court permitting me to appear *pro hac vice*.

8. I shall abide by the Rules of this Court, including disciplinary rules, and shall notify the Court immediately of any matter affecting my standing at the bar of any court.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2009.



Charles R. Bacharach

Julio C. Gomez (JG-0005)
GOMEZ LLC
ATTORNEY AT LAW
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Westfield, New Jersey 07090
Tel 908 780 1080
Fax 908 789 1081

Attorney for Defendants, Superien Health Networks
and Interplan Health Group

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MICHELE SANDER,

Plaintiff,

v.

Civil No. 08-cv-1383 (PGS-ES)

HR TRUST SERVICES, LLC, *et al.*,

Defendants.

CERTIFICATION OF JULIO C. GOMEZ, ESQ.
IN SUPPORT OF CHARLES R. BACHARACH, ESQ.'S
REQUEST TO APPEAR *PRO HAC VICE*

I, Julio C. Gomez, of full age, solemnly swear and hereby declare and certify as follows:

1. I am admitted to practice before this Court and sole member of the firm GOMEZ LLC Attorney At Law, located at 111 Quimby Street, Suite 8, Westfield, New Jersey 07090.
2. My firm is local counsel for defendants Superien Health Networks ("Superien") and Interplan Health Group ("Interplan").
3. I make this certification in order to place certain information before the Court in support of Charles R. Bacharach, Esq.'s request to appear *pro hac vice* in the above-

captioned matter pursuant to Loc. Civ. R. 101.1(c).

4. I am a member in good standing of the Bar of this Court.

5. Charles R. Bacharach is a member in good standing the Bars identified in paragraph 4 of his Certification submitted herewith in support of his application; to my knowledge there are no pending disciplinary proceedings against him in any State or Federal court.

6. Charles R. Bacharach is a member at the firm of Gordon, Feinblatt, Rothman, Hoffberger & Hollander, LLC, in Baltimore, Maryland. I have found him to be a skilled attorney and a person of integrity. He is thoroughly experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

7. Counsel for plaintiff and the remaining defendants have consented to the *pro hac vice* admission of Mr. Smith.

8. I respectfully request that Charles R. Bacharach, Esq. be permitted to appear *pro hac vice* in this action pursuant to Local Civil Rule 101.1(c); however, all pleadings, briefs and other papers filed with the Court on behalf of defendants Superien and Interplan shall also be signed and filed by me. I shall also be responsible for said papers, and for the conduct of the cause, and Mr. Bacharach's conduct, and I shall be present in Court during all phases of these proceedings, unless expressly excused by the Court.

I hereby certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed in Westfield, New Jersey this 2nd day of December, 2009.



Julio C. Gomez (JG-0005)

Julio C. Gomez (JG-0005)
GOMEZ LLC
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Attorney for Defendants, Superien Health Networks
and Interplan Health Group

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHELE SANDER,

Plaintiff,

v.

HR TRUST SERVICES, LLC, *et al.*,

Defendants.

Civil No. 08-cv-1383 (PGS-ES)

**ORDER ON INFORMAL
APPLICATION FOR ADMISSION OF
COUNSEL *PRO HAC VICE***

This matter having been opened to the Court on informal application by GOMEZ LLC Attorney At Law, local counsel for defendants Superien Health Networks and Interplan Health Group, for an Order, pursuant to Local Civil Rule 101.1(c), allowing Charles R. Bacharach, Esq. of the firm of Gordon Feinblatt Rothman Hoffberger & Hollander, LLC, to appear and participate *pro hac vice*, and the Court having considered this matter, and for good cause shown,

IT IS on this _____ day of _____, 20____,

HEREBY ORDERED that Charles R. Bacharach, Esq., of the firm, Gordon Feinblatt Rothman Hoffberger & Hollander, LLC, 233 E. Redwood Street, Baltimore, Maryland, 21202; with telephone number (410) 576-4000; with fax number (410) 576-4246; and e-mail

address cbacharach@gfrlaw.com is admitted to practice *pro hac vice* as counsel for defendants Superien Health Network and Interplan Health Group in the above-captioned case in the United States District Court for the District of New Jersey; and it is

FURTHER ORDERED that Charles R. Bacharach, Esq., shall remit to the New Jersey Lawyers' Fund for Client Protection the annual payment required in accordance with New Jersey Court Rule 1:28-2(a) for each calendar year Mr. Bacharach continues to represent a client in a matter pending in this Court; and it is

FURTHER ORDERED that Charles R. Bacharach, Esq., pay \$150.00 to the Clerk, United States District Court for the District of New Jersey; and it is

FURTHER ORDERED that Charles R. Bacharach, Esq., shall abide by the Rules of this Court, including disciplinary rules, and shall notify the Court immediately of any matter affecting my standing at the bar of any court.

The Honorable Esther Salas, U.S.M.J.